DOCUMENT RESUME

ED 158 403 EA 010 830

AUTHOR Bourexis, Patricia S.
TITLE Policy Implementation Factors Related to School Compliance.
PUB DATE 29 Mar 78
NOTE 62p.; Paper presented at the Annual Meeting of the American Educational Research Association (Toronto, Ontario, March 27-31, 1978)

EDRS PRICE MF-$0.83 HC-$3.50 Plus Postage.
DESCRIPTORS Adoption (Ideas); Elementary Secondary Education; *Exceptional Child Education; Questionnaires; *Special Education; State Legislation
IDENTIFIERS Boston Public Schools MA; *Massachusetts Comprehensive Special Education Law

ABSTRACT

The Massachusetts Comprehensive Special Education Law (Chapter 766) was used as a model for P.L. 94-142, the federal law mandating education for all handicapped students. This draft reports preliminary findings of a study concerning compliance with and implementation efforts toward the Massachusetts law, with an eye toward implications for the federal act. The field study focused on nine Boston public schools chosen to reflect varying degrees of compliance with the law. Data were gathered through interviews with principals and Core Evaluation Team chairpersons, the prime school-level implementors of the law. The study suggests that school-level implementation factors related to compliance include (1) goal consensus and role clarity by school personnel; (2) sophistication of the school's organizational processes; (3) ability of the school to communicate with other organizations; (4) sufficiency of human, fiscal, physical, and material resources; (5) amount of control over the implementation process; (6) the level of commitment to compliance; (7) the number of children who are referred and the ability to handle them; and (8) the amount of time the school has had to comply with the measure. From the school's perspective, the main constraints to compliance include lack of personnel and materials from the Boston Public Schools and unmanageably high caseloads. (Author/JM)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

ED158403

Policy Implementation Factors Related to School Compliance

Patricia S. Bourexis

Syracuse University

"PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

Patricia S. Bourexis

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC) AND USERS OF THE ERIC SYSTEM."

March 29, 1978
AERA 1978 Annual Meeting
Toronto, Canada

Printed in the United States

EA 010 830

WORKING DRAFT

The passage of the Elementary and Secondary Education Act (ESEA) in 1965 signaled a major breakthrough in the intervention of federal policy into the activities of the local education agency and opened the door for a series of analogous federal-local interventions (Bailey & Mosher, 1968). Since 1965, federal educational policy has maintained and expanded as political fact the federal role in both financial aid and service programming.

As a federal educational policy statement, the Education for All Handicapped Act (P.L. 94-142) parallels if not exceeds ESEA in the magnitude of its potential fiscal and service program impact.

Proposed federal authorization at the level of $800 million for the 1979 fiscal year evidences strong Congressional intent to support full implementation. However, as with other educational programs of this magnitude, initiated at the federal level, federal financial support is insufficient causing federal, state, and local education agencies to reallocate existing financial resources and commit additional monies to meet their responsibilities under the Act.

A state, or local education agency's full implementation of P.L.94-142 is measured by the extent to which that agency provides for and delivers specified educational practices to serve its handicapped children. These practices are defined within the text of the Act and its rules and regulations addressing:

-- a free appropriate education for all handicapped children

-- procedural safeguards

-- confidentiality

-- evaluation procedures

-- individualized education programs

-- least restrictive alternative placement

-- private school management

-- personnel development

-- intra- and inter-agency planning

-- service delivery development, administration, and evaluation

-- program monitoring and supervision

Timelines for enactment of these practices are also specified: September 1, 1978, for service to children aged three to eighteen and September 1, 1980, for handicapped youth aged three to twenty-one.

Section 3 of P.L. 94-142 states that there are more than eight million handicapped children in the United States, more than half of whom are not receiving appropriate educational services, one million of whom are excluded from the public school system, and many more of whom participate in public school programs with undetected handicaps that prevent them from achieving to their fullest potential.

The Act attributes this problem to the lack of adequate services within the public education system and insufficient numbers of personnel trained in diagnostic and instructional procedures and methods. The assumption is clearly that ". . . given appropriate funding, state and local educational agencies can, and will provide effective special education and related services to meet the needs of the handicapped children" (The Education for All Handicapped Children Act, Sec. 3 (b) 8).

In addition to the service delivery and resource allocation expectations of the Act, through provisions for comprehensive evaluation, individualized education programs, and least restrictive alternative placement, P.L. 94-142 goes so far as to redefine the role (s) and responsibilities of both special and general educators for the delivery of educational services to handicapped children. The least restrictive alternative placement provision requires

> . . . that to the maximum extent appropriate, handicapped childern, including children in public and private institutions or other care facilities, are educated with children who are not handicapped, and that special classes, separate schooling or other removal of handicapped childern from the regular educational environment occurs only when the nature or severity of the handicap is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily. (The Education for All Handicapped Children Act, Section 612 (5) (B).

Of even further consequence is the fact that P.L. 94-142 requires compliance on the part of state and local education agencies, where compliance is defined to be the complete adoption of the Act's specified educational practices. Failure to comply on the part of an education agency results in financial penalties in the receipt of federal and state funds as well as in legal prosecution for direct violation of a federal law.

There is little doubt that P.L. 94-142 constitutes a major federal educational policy statement which, because of the ambitious nature of its goals and the pervasiveness of its influence on the educational

system, can be expected to experience constraints to impact similar to that of its predecessors. This forecast, together with the compliance nature of the policy as it bears on state and local education agencies, makes information and assistance on policy implementation of critical interest to those agencies.

Problem Statement

Social scientists are beginning to realize that they have been naive about the criticality and complexity of policy implementation. The implementation period for large educational programs has been assumed to be a brief interlude between the policy decisions and full field operations, an interlude that occurs without much study, guidance, and intervention.

To engage in study of the policy implementation process, it is obvious that one needs policies to study. Until the present time, there has not been a major final policy statement in the area of special education (Weintraub, Abeson, Ballard and LaVor, 1976).

The Education for All Handicapped Act of 1975 (P.L. 94-142) provides an excellent opportunity for the furthering of knowledge in the area of policy implementation research and requires such inquiry in ensuring that federally mandated educational practices impact effectively on the actual delivery of educational services to handicapped children.

P.L. 94-142 is a rich area for implementation research to improve

program implementation strategies, to enhance successful program delivery, and to understand the resources and constraints that determine program impact (Hargrove, 1975). However, implementation research needs to focus on manipulable organizational factors and to provide information on these variables in a timely and relevant manner so as to influence programmatic decisions. With the case of P.L. 94-142, implementation occurs over a period of years, with little flexibility to alter the policy statement except through statutory amendment.

What is available as an avenue for empirical implementation research are numbers of state special education laws quite similar to the federal Act. Specifically, Massachusetts is currently in the fourth year of implementation of a Comprehensive Special Education Law (Chapter 766) that served as the policy model for P.L. 94-142. The state statute, and its rules and regulations closely parallel P.L. 94-142 both in the nature and scope of required educational practices, and in the procedures defined for compliance. This study focused on urban schools in Massachusetts organizational response to Chapter 766. But because of the similarity between Chapter 766 and P.L. 94-142, as policy statement, and the rather invariant organization of schools across districts, the results of this study have implications for program design and operations in other school districts engaged in the implementation of the federal Act. Likewise the variables defined serve as a framework for further special education policy implementation research and analysis in an organizational setting.

The Policy Process

Public policy implementation can best be understood as a component

of a larger policy process. Various models of this process exist (Easton, 1965; Thompson, 1976, Hall, 1977). The model guiding this study defines public policy as a purposive course of action followed by a governmental body or official(s) in dealing with a problem or matter of concern. This intent, in turn, is evidenced by a policy decision that authorizes or gives direction and content to the chosen course of action (Anderson, 1975).

The public policy process is comprised of four components, not necessarily linear in occurrence:

1. Policy formulation and adoption, or the design phase wherein a problem is defined, alternative courses of action are examined, a policy decision is proposed, and is then legitimatized through a legislative, judicial, or administrative process. This phase culminates in the formulation of a policy statement, which has as its content the policy's goals usually expressed as desired behaviors and or practices required of one or more target groups, or populations.

2. Policy implementation, or those attempts on the part of public and private individuals within one or more organizational environments.

3. Policy impact, or the actual consequences or outcomes of a policy decision, as described by those behaviors and/or practices actually adopted by each target group.

Actually policy implementation is a very general term which in literature is usually assumed to be familiar to the reader, and therefore left undefined; or identified as a "point in time," as in ". . . that part of a public program following the initial setting of goals, securing of agreements and commitment of funds" (Pressman and Wildavsky, 1973, p. xii).

The 1975 Random House Dictionary gives a meaning for the verb, "to fulfill; perform; carryout. To put into according to or by means of a definite plan or procedure." (p. 667) Applied to the study of public policy in a governmental context would imply," . . . describing the means by which government carries out programs or those processes of program administration which take place after a given policy has been agreed upon in a prior policy formation and decision stage" (Hargrove, 1975, p. 4).

Implementation, then, is the stage of the policy process between a policy decision or statement and full program operation (Williams, 1975). It begins with the development of specifications for the desired behavior and/or practices (those policy objectives), often in terms of rules and regulations, and encompasses any action directed toward the achievement of policy goals. "This includes both one-time efforts to transfer policy decisions into operational terms, as well as continuing efforts to achieve the large and small changes mandated by policy decisions" (Van Meter & Van Horn, 1975, p. 447).

Summary of the Literature on Policy Implementation

The available policy implementation research proves implementation to be a complex process dependent upon the interaction of the content of the policy, the actual practices and behaviors so specified; the target groups, those people who are directly affected by the policy and who must change to meet its demands; the implementing organizations, or bureaucratic units at various governmental levels responsible for

implementation of the policy; and environmental factors that influence or are influenced by the policy implementation (Quade, 1975, p. 26).

Variables within each of these areas have been tentatively defined: resource allocation, communication, incentives and consensus toward implementation, goal clarity, planning and management configurations (Kritek, 1976, Bardach, 1977; Ingle, Klauss, and Lutter, 1977). Yet to the present, these institutional, programmatic, and individual variables have not been operationalized across policies nor sufficiently tested within particular implementation situations to permit the discovery of causal relationships (Hargrove, 1975). The same is true with the few theoretical frameworks proposed for study (Van Meter and Van Horn, 1975; Williams, 1975).

What seems to be required, then, to further the knowledge base in implementation, is theory-building studies which combine survey research methods to differentiate impacts among organizations, with case study efforts to isolate and describe implementation factors or variables, and relate these to impact. In this manner, research efforts can be guided by and take full advantage of the proposed conceptual frameworks and thereby increase the liklihood of the generalizability of research findings.

The study of implementing organizations seems a particularly rich area of inquiry. Once into its implementation phase, policy content is rather fixed. What appears most influential on implementation are those characteristics of the governmental levels, or organizations, whose decisions are the mediating variables to impact (Pressman and Wildavsky, 1973; Murphy, 1971, 1973; Weatherley and Lipsky, 1977).

The priority research question then becomes, what can be learned about these organizations and their behavior that might influence the implementation process. Implementation studies which derive their theories from the study of organizations and assume an organizational perspective have the potential to contribute most to implementation knowledge.

The Study

This descriptive field study sought to describe schools' compliance with Massachusetts Comprehensive Special Education Law (Chapter 766) and the extent to which specific school-level implementation efforts were associated with these compliance outcomes. The findings are presented as a typology of school implementation factors related to special education policy compliance.

The focus on the school as an organization assumes that institutional behavior influences implementation, and that knowledge about this behavior can, therefore, illuminate the policy implementation process. This study investigated the internal functioning of schools as it affected their external behavior, or response to special education policy (Hargrove, 1975). More specifically, the study concentrated on describing the roles, strategies, and interactions of school-level implementors and how their efforts influenced that school's compliance. Inter-organizational or external factors were of secondary concern during the field investigation, but as the findings indicate often proved most predictive of compliance.

The study was conducted in one of the nine administrative districts of Boston Public Schools.

A stratified sample of nine schools (six elementary, two middle, and one senior high school) was chosen so as to reflect the variance in schools' compliance. The sample over-represented schools whose compliance was judged to be either extremely poor or extremely good in light of the numbers of children referred for special and related services.

Focused interviews (Merton, Fiske, and Kendall, 1956) were held with each policy implementor in those schools. The interview achieved three purposes: 1) to describe the school implementation efforts; 2) to verify the school's compliance; 3) to elicit implementor's perceptions of the relationship between implementation efforts and compliance.

These interviews were content analyzed (Holsti, 1969; Kerlinger, 1973). The results of this analysis are presented as a typology of implementation factors which may guide further inquiry into special education implementation.

Field Study Research

The study was conducted in the field environment of the school, in contrast to an experimental laboratory, without any attempt to isolate and manipulate the variables or situations within that environment. Characteristic of field research, the study is an *ex post facto* inquiry investigating a situation or condition already occuring or in place, in this instance, the implementation of Chapter 766.

The study is theory-generating in form (Glaser and Strauss, 1973). Verifying an existing theory on implementation or change supposes the testing of *a priori* hypotheses, while generating a theory implies the abstraction of concepts from empirical data so as to suggest these

hypotheses which may be verified or tested in future research. This study seeks to develop such conceptual categories, indicators of such, and linkages which might provide a plausible explanation of special education policy implementation and promising hypotheses for further study.

This study uses the techniques of comparative anaylsis (Glaser and Strauss, 1973) of a number of cases (schools) to systematize its theory-generation. This analysis procedure enables the researcher to verify facts found in a particular school, and to establish the generality of those facts prerequisite to the formulation of tentative hypotheses.

The study reported here generates a middle-range substantive theory applicable to the implementation of special education policy in schools, particularly urban schools. This is not to preclude the generalization of its findings to other educational policies, to other organizational units within the education delivery system (such as an intermediate educational unit), to schools in suburban and rural areas, or even to non-education policy areas. Its findings may be related to knowledge in each of these areas. However, delineating the substantive boundaries of this effort does aid in the interpretation and application of the results, and in the selection of cases for study.

Field Study Site

One of the nine administrative areas within Boston Public Schools, served as the field study site. Demographically, the District is representative of BPS as a system; its student population

(14,473) comprises 17 per cent of the total school population (83,199). Its racial composition is consistent with that of the larger system--white, 45 per cent; black, 42 per cent; hispanic, 10 per cent; Asian, 3 per cent; American Indian, .4 per cent.

The district had identified 12.94 per cent of its student population as "children in need of special education services," and was attempting to provide special education services for these children.

There are twenty-two schools in the District: 2 high schools, 4 middle schools, and 16 elementary schools, Each maintains a resource room program which mainstreams children with special needs. "Substantially-separate" programs operate within thirteen school buildings and children are transported to these classes where necessary. Itinerant services in speech, vision, and learning disabilities are available within each of the twenty-two buildings.

Responsibility for compliance with the requirements of Chapter 766 is shared by the building Principal and a Core Evaluation Team Chairperson (CET). Most Chairpersons work within a single building, although a few serve two of the smaller elementary schools. A Special Education Coordinator is employed at the District level; an Associate Superintendent for Special Services maintains over-all responsibility for special education at the system level. The District Superintendent, the Special Education Coordinator, and the Associate Superintendent for Special Services were each supportive of the study effort, and afforded the investigator access to the schools.

The District Superintendent, Special Education Coordinator, and

State Monitor interpreted compliance to mean the extent to which a specific set of practices for the referral, evaluation, placement, and servicing of children in special education services, and for which the building-level policy implementors are responsible, have in fact been installed and were operable. These same district and state personnel indicated that, in their opinion, compliance varied among individual school buildings.

Compliance Measure

The first objective of this study was to determine the extent to which each District school was in compliance with Chapter 766 requirements. Chapter 766 specifies practices in the referral, identification, evaluation, placement, service delivery, and program review of children receiving special education and related services. Assessing compliance in the service delivery areas exceeded the resources and, therefore, the scope of this study. This study focused on compliance only in the referral and identification, evaluation, placement, and program review areas of the Law and studied the implementation of these portions of the policy statement.

In these areas, the Chapter 766 requirements are that:

1) Any child aged three to twenty-one residing within that school district may be referred for special services. This includes those children not attending school, those attending a private or paraochial school, and those receiving services in a home, hospital, or private residential setting. Once a referral is initiated, the child's parents are to be

notified and their permission obtained to proceed with the evaluation.

2) A child is evaluated for placement through either an intermediate or full core evaluation process within thirty days after referral. This process culminates in a meeting of an interdisciplinary team including the parent(s), school administrator, CET, classroom teacher, specialists, and the child. The outcome of this meeting is the development of an individualized educational plan (IEP) signed by the parent(s).
3) The child must receive special services within thirty days after the IEP is signed.
4) Each child's IEP is reviewed periodically, and at least once a year.

Data available through the District office were surveyed to determine each school's compliance with the above requirements. Though Massachusetts was in its third year of Chapter 766 implementation, complete data on the numbers of children referred, comprehensive evaluations completed, educational plans written, children placed, and plans reviewed were available only from January 1977. At that time the newly appointed Associate Superintendent for Special Services standardized both school and district-level reporting procedures. Data for January-March, 1977 were included in the compliance measure (Appendix A).

These data yielded a quantitative measure of school compliance. As a second compliance activity, and as an attempt to introduce a qualitative compliance measure, the researcher rated five (5) IEPs selected at random from each of the twenty-two schools as to their technical and

content compliance with Chapter 766 provisions. The plans were written in January-March, 1977.

An IEP Compliance Checklist was adapted from an instrument developed by the Syracuse University Division of Special Education and Rehabilitation. Each of the thirty checklist items were referenced to information required by a section of Chapter 766 rules and regulations. Each IEP was rated against each of the thirty technical and content information items, the number of items successfully met summed for each group of five IEPs from a school, and a percentage measure calculated as: number of items successfully completed / 150. By this procedure, each information requirement was equally weighted, i.e. the child's name vs. the writing of behavioral objectives. However, from the school district's perspective, both peices of information seemed equally important. The IEP Compliance Checklist is included as Appendix B.

Sample Selection

The study required a sample of approximately ten schools chosen so as to reflect:

1) the range in school enrollment,
2) both elementary and secondary levels,
3) the range in the numbers of children referred for special services, and, therefore, the numbers needing evaluation, educational plans, placement, and reviews, and
4) the range in the numbers of children receiving services in that school, for once a child is placed in a program, the school housing that program becomes responsible for that child's program.

The sample was also chosen to represent the variance in schools' compliance as defined as their ability to process children through the evaluation, educational planning, placement, and review procedures within the time frames specified within the Law. Discernable indicators of compliance, or rather non-compliance included:

1) the numbers of children waiting more than thirty days for evaluation and/or IEP development,
2) the numbers of children with IEPs requiring Review Committee approval prior to placement in a segregated setting,
3) the numbers of children with IEPs waiting over thirty days for services, and
4) the numbers of children not receiving periodic review, according to the schedule specified in their IEP.

Choosing the sample on the basis of the compliance measure cast as a dependent variable is what Kerlinger refers to as testing alternative or "control" hypotheses.

> "In this kind of ex post facto control, instead of having alternative independent variables, say x_1 and x_2, we have alternative dependent variables, y_1 and y_2. we again assume that the alternatives exhaust the possibilities. If this is so, than x is either associated with y_1,...or with y_2, or with both.... The method of testing alternative hypotheses, though important in all research is particularly important in ex post facto studies, because it is one of the only ways to 'control' the independent variables of such research" (Kerlinger, 1973, p.390).

This sample design insured the researcher of the opportunity to investigate the most "insight-stimulating" examples, maximizing the

liklihood that all aspects of the problem under study would in fact be observed.

Applying these criteria, a sample of nine schools--one high school, two middle schools, and six elementary schools was selected for closer study. The schools ranged in enrollment from 292 to 1397 students. The number of children referred for core evaluations during January-March, 1977 ranged from 7 to 30; the number requiring program reviews from 8 to 51; the number of IEPs written in that three month period from 12 to 84.

None of the schools in the sample were in complete compliance. The numbers of children awaiting educational plans varied from 0 to 39; children not receiving specified program reviews on schedule numbered from 0 to 66; children awaiting Review Committee approval for placement in a segregated program ranged from 0 to 14; children with IEPs awaiting services varied from 2 to 17. The technical/content rating of the schools' IEPs ranged from .56 to .80.

The sample included schools with experienced Principals as well as those new to the District or to Chapter 766 responsibilities. Some CETs had served as regular and/or special education teachers in their buildings prior to Chapter 766 implementation; others were new to the process and the position. Two of the elementary schools in the sample "shared" a CET. Of those Principals interviewed, six were men, three were women. Of the eight CETs interviewed, four were men, and four were women. All were thought to be certified special education teachers.

Focused Interviews

Once the sample selection was complete, and access to these schools provided through the District Special Education Coordinator, interviews were held with the Principal and Core Evaluation Chairperson (CET) of each of the nine sample schools. These interviews had three purposes:

1) to obtain a description of Chapter 766 implementation efforts in that school,
2) to verify the compliance measure, and
3) to obtain implementors' perceptions of the relationship between their implementation efforts and compliance.

Prior to formulating an interview guide, the researcher analyzed the implementing situation in the schools through two activities. First, a review of the literature on policy implementation suggested a universe of implementation factors or influences which might be found in this situation.

Second, six "test" interviews were held with the Principals and CETs of two elementary and one secondary school. These were District schools not in the sample. During these interviews, the researcher explained the research problem, the study objectives, and activities to date, acquainted the interviewees with the implementation literature. The interviewees were requested to recount their experiences and assist in the generation of relevant questions or hypotheses about Chapter 766 implementation and compliance in schools. In effect, the researcher and these six school-level implementors cooperatively built an interview guide (Appendix C).

Each of the seventeen interviews were individual interviews held privately between the researcher and the Principal of CET; all were conducted in the school in a setting chosen by the interviewee. Fourteen of the interviews were recorded and later transcribed for analysis. Three Principals refused permission to tape record the interview, but allowed the researcher to take notes. The interviews varied in length from 45 to 90 minutes.

Caseload Management Survey

During the interviews, the issue of caseload, those numbers of 766 children for which a CET is responsible, appeared as a potentially important implementation factor. To probe this concept further, a caseload management survey was distributed to twenty-two District principals and eighteen CETs in December, 1977. Due to winter storm conditions and school closings, the survey was not circulated until January, 1978.

The survey included eleven questions designed to determine

(1) the number of children referred to Chapter 766, the source of these referrals (preschool, private school, etc.), and the placement of the child in 766;

(2) the process of caseload management, including the number of CORE evaluations, reviews, and educational plans completed each month, the factors complicating caseload management; and

(3) the areas of non-compliance.

The responses were separated into secondary and elementary principals and CETs (four groups), and arithmetic means calculated for each respondent group for each question. At present, only this preliminary analysis is available (Appendix D).

Findings

Chapter 766 has "...heightened people's awareness about the individual needs of children." "Teachers look upon these children as children with special needs, not somebody to be feared." Many more children have been identified and are receiving special education services according to an individualized educational program; and more children are receiving these needed services through the public school system. Special needs children are less isolated from regular children, even within the substantially separate classroom programs. More parents are aware of the assistance available from the school, and more involved in the educational process related to their child. Schools are beginning to coordinate service delivery to children through the numerous community-based agencies.

Chapter 766 Goals, Objectives and Procedures

Chapter 766 regulations clearly state the goal of the Law; "...to provide for a flexible and uniform system of special education program opportunities for all children requiring special education..." (Regulation 766, Massachusetts Department of Education, p. II). At the school level, this goal has remained primarily intact.

There are two reasons for this. First, in contrast to the usual vague, abstract goal statements of most educational policies, Chapter 766, as P.L. 94-142, is prescriptive legislation. Its "means", in terms of its regulations, as well as its "ends," in terms of its goals, are clear and precise. The Law, therefore, is less open to individual interpretation and discretion. "I think the more we work with 766, the more we understand it....Our sophistication has grown."

Second, the purposes of 766 are ideologically compatible with the educational philosophies of its school-level implementors, the Core Evaluation Team Chairpersons (CETs). These special education trained personnel are personally committed to the educational rights of the handicapped, and to the goals of 766. They, and their Principals, perceive the policy as extremely important to the education of all children. Given sufficient resources, compliance is seen as both feasible and essential to achieve.

This is not to say that the Law is without interpretation. School implementors perceive a "bias" in favor of those resource room placements and service patterns which permit children to remain in the "mainstream" while receiving services. They refer to Chapter 766 as the "mainstreaming law." For most, this is a desirable bias; for some the high proportion of mainstreamed decisions has denied the most appropriate placement to those children who would more greatly benefit from the self-contained environment. A law written to correct inequities may have instituted still others.

While the regulations clarify the intermediate outcomes under the Law, they are insufficient to serve as procedures to standardize performance at the building and even the school district level. These necessary procedures, largely developed by BPS' Department of Special Services, have been in a constant state of change throughout the three-year implementation period. The effect has been to create an unclear implementation situation at the building level, leading to frustration on the part of principals and CETs, and to uneven response.

> "The problem is the operation of the regulations at the procedure level, the mechanics. While the Law and the philosophy behind it haven't changed, the directives for implementation change every week. There is enough turmoil to create a very unstable situation."

CETs have filled this void with building-specific procedures, and have then resented procedural direction from BPS when it was offered. This delayed response on the part of BPS may, in fact, be the major factor in what has developed into an adversarial relation among the schools, the District, and the Department of Special Services.

School Compliance

According to the data available through the District office, none of the district's twenty-two schools is in complete compliance with the provisions of Chapter 766 governing the referral, assessment, placement, servicing, and evaluation of children. Areas of non-compliance, in order of their frequency of occurrence, appear to be:

(1) Children not receiving periodic reviews of their IEPs and progress;

(2) Children with signed IEPs awaiting placement in programs and services;

(3) Children whose placement is awaiting Review Committee approval;

(4) Children referred waiting over thirty days for CORE evaluation.

Principals and CETs in the nine sample schools differentiate among these four non-compliance areas as to their importance.

Non-compliance for failure to place and service a child who has received a CORE evaluation and who has an IEP is the most serious offense. School personnel assume responsibility for this non-compliance, recognizing the school does not control the placement process and schedule. The Department of Special Services (DSS), "Downtown" controls. Placements are delayed because DSS does not have sufficient program capability (the program is not available), or cannot coordinate transportation services.

The school is left to explain this failure to the parent(s) and to service the child within the building in a substitute manner, clearly in violation of the child's IEP. Principals and CETs relate instances of six to eight months' delay, of misplaced IEPs, and of bureaucratic breakdowns. The situation is similar when the child's placement is recommended as a substantially separate classroom (prototype 502.4) where the IEP requires approval by a DSS Review Committee.

To resolve this "frustration of responsibility without control," school principals and CETs have developed two definitions of compliance, "technical compliance," and "substantive compliance." The school is in "substantive compliance" if it has successfully performed those functions or components of the placement process over which it can exercise direct control; referral, CORE evaluation, IEP development, and program review. The school's failure to complete required program reviews on schedule is clearly seen by them as a violation of substantive compliance.

"Technical non-compliance" occurs when a child's program is delayed over thirty days because of the extra time required to

contact and involve parent(s) and/or private agency personnel, the complexity of the case requires additional assessment activities, or the case involves "Downtown", and therefore a loss of direct school control. Technical non-compliance is seen as acceptable for two reasons. Without ability to control the process, one need not feel accountable; and, the delay is excusable when it results in more appropriate parental involvement and better programming for the child.

Principals and CETs view 766 compliance as extremely important. They believe 766 results in the improved and equitable delivery of services to handicapped children. Of equal importance, it's the law.

> "The fact that you see progress in the children. To me that is the reward. I don't want any child in the regular classroom who can be getting help with a vision teacher, learning disability teacher, the resource room. All these people come under 766 and I want all the help I can get for my student."

> "Non-compliance? The school would fall apart. You have to be in compliance. You wouldn't stay as an administrator very long."

> "Because it's a law. Because I've been brought up that a rule is a rule and to be followed."

Mosher (1977) comments that school administrators are a highly homogeneous, and uniformly socialized group, having spent almost their entire lives under the socializing influence of the public schools. Since obedience to laws and rules are highly prioritized values within the schools, it is no wonder that these same administrators are strongly motivated toward compliance with a law. Conversely, any ill-effects introduced into schools as a consequence of Chapter 766 implementation can be blamed, not

on the administrator, but "on the law".

From the schools' perspective, the main constraint to compliance is the lack of personnel, and materials provided the schools by BPS. DSS' attempts to develop pre-referral procedures to minimize inappropriate referrals for Chapter 766 services are thought to have been effective, so that those children presently entering 766 belong in the program and deserve its services. But BPS has not been able to meet the demand for programs, particularly resource room services, in school buildings. Since personnel and materials allocations are made at the BPS level, the schools assume no ownership of this most important problem.

Schools also use the stigma of non-compliance as an influence to command these additional resources from the system. One school organized the parents of resource room children who were inadequately served in its overcrowded and under-equipped programs. and obtained the additional teacher and instructional materials it had long requested. Another school allowed a "backlog" of referrals to accumulate to demonstrate its need for another CET.

> "I've been working on this job for three years and I'm beginning to think now that the only way I'm going to get those things I want is to be in non-compliance."
>
> "The only way to command resources is to be out of compliance. It's funny, but you're rewarded for non-compliance."
>
> "Being out of compliance is Court Street's fault. They're supposed to supply the personnel."

Caseload

The other major constraint to school compliance, and one over which the school does assume responsibility and can exert some control

is its caseload, or number of children enrolled in Chapter 766. A school's, or more appropriately, a CET's caseload is generated through the referral to 766 of any child, aged three to twenty-one, residing within the geocoded area of the school. The child may attend that school, be pre-school aged and/or enrolled in a kindergarten program, be enrolled in a private or parochial school, receiving services in a home, hospital, or other private setting, or be post-16 and/or out of school. In the 1977 spring semester, District secondary school caseloads averaged 126, the elementary schools averaged 113. Caseloads ranged from 10 to 26% of school enrollment. Since that time, both have increase, the secondary to 176, the elementary to 138. A survey of CETs revealed that a "managable" caseload would be 110 for a secondary school, 76 for an elementary.

Caseloads are inconsistent among schools, dependent upon the number and kind of private schools and agencies geocoded to that school. An individual school can serve as many as five parochial schools located nearby. These "outside" referrals greatly complicate caseload management, require excessive expenditures of time to coordinate agency and private school personnel, and necessitate the CET travelling away from the school.

Although the Law is quite clear that these children are equally entitled to 766 services, many CETs resent the time away from their building and attention lost to those children enrolled in their school.

> "You get a call from the school saying they want a CORE evaluation on this kid and you never heard of the kid and the kid will never be in the building. He'll stay in private day schools, and I'll never see him."

> "There should be a central team working out of Court Street to handle the outside cases, and let us in the school handle the in-school cases."

As a major consequence of larger and more diverse caseloads than anticipated, CETs have placed the highest priority on the completion of CORE evaluations and initial IEPs, second priority on periodic reviews of these IEPs, and only third priority on monitoring the implementation of the child's IEP and his/her progress. In reality, this third priority is not addressed at all in most schools. Priorities one and two, those most visibly associated with school compliance, often fall behind schedule.

> "By the end of June, I will have written 146 plans. That's about a plan a day. It represents a lot of work, not just the actual writing, but all the communication that has to go on prior to the people getting together."

> "I would like to be able every so often to whip out some folders and maybe even systematically go through them. Just right now with what I have, that's impossible."

School personnel failed to anticipate the time required to execute the administrative duties associated with caseload management. At least four copies of each IEP and Review are required, one each for the parent(s), and CET, school, and District files. CETs must schedule an appointment and travel to the District office to xerox the plans and meet with the District Coordinator to approve the plans. These trips can involve up to a day of CET time.

Clerical support to CETs is in short supply. Secretaries are provided by BPS usually for one to three days, only occasionally for four or five days per week. CETs, while appreciative of the assistance, maintain it to be inadequate. Instead, they work extra night and weekend hours to "stay even".

The School Implementation Situation

Chapter 766 implementation within the schools is best described in terms of those groups and/or individuals participating in the effort, and the coordination, communication, and management processes facilitating their work.

The school principal is responsible for and accountable to the District Superintendent for school Chapter 766 performance. Each of the nine principals interviewed was familiar with 766 regulations, and their school's present and past performance. None was "new" to the principalship or to special education. They averaged ten years' administrative experience. All had supervised special education classes both prior to and under Chapter 766. Only one had actually taught special education. One had only recently served in the central office as a coordinator of desegregation directives. Two principals were new to their respective schools, but one of these was a parent in that community and therefore familiar with the school and the parents. One principal had served twenty-one years in the building; another had served a total of twenty-seven years in two District schools. Each evidenced support for Chapter 766 implementation.

BPS supports a full-time Core Evaluation Team Chairperson (CET) in each school. Occasionally, two smaller elementary schools share the services of a single CET. All but one of the eight CETs interviewed were certified and experienced special education teachers (the remaining CET is presently pursuing a master's degree in generic special education). Six hold certification in more than one special education area. All had previously taught in the District ; five had worked in the school in which they now served as CET. They averaged 2.7 years experience as a CET.

Each of the eight had volunteered or actively sought the CET position. The five who had switched positions within their schools, felt they could do the job well, leave the classroom and contribute to the improvement of education for handicapped children in a different manner. With the exception of possible abuses of the mainstreaming concept, all were enthusiastically committed to Chapter 766. In the interviews, these CETs appeared as highly self-motivated, energetic, and autonomous personalities who capably and confidently addressed their work.

At the same time, these CETs were frustrated over the lack of role clarity and description under which they were asked to operate, the long overtime hours required to process the paperwork and manage the caseload, and the inequity of responsibility and compensation. They function as program administrators, while receiving teaching scale salaries. Few saw extrinsic rewards to the position; the majority considered leaving the position unless working conditions improved.

CETs are formally referred to as the principal's Chapter 766 designee. As one principal commented, "I'm responsible, and he/she does all the work!" As of spring 1977, a formal CET job description did not exist.

This lack of a formal role and line of authority has caused problems.

> "I don't have any authority over these teachers, and I can't tell them the Law says you have to modify your classroom program for these kids as a prerequisite to referral."

> "Who do I work for? The District Superintendent? The principal? I get paid by the principal, so I'm working for him. He's my immediate supervisor."

CETs describe themselves in terms of various positions: as an assistant principal, as director of special education, as a department head, as a liaison to the school and community, and as an advocate for handicapped children.

What authority the CET has is derived from the working relationship established between the CET and the principal. In the majority of schools, these relationships are strong, and as a result, the CETs are highly influential personnel.

The principals delegate 766 administration to the CET. In one elementary school the principal continues to handle pre-referral contact with the parent, and the CET takes over when a referral is actually made. The CET coordinates the referral, assessment, and IEP development, and usually presents the IEP to the principal for discussion prior to the CORE evaluation team meeting, and review and signature after the meeting.

> "I (principal) don't have the time, nor really the knowledge and direct expertise, so I depend on him/her (CET) to do it. If there's any problem, I expect him/her to keep me aware of it. When he/she has completed a CORE, he/she brings it up, briefs me on it, and I sign off. He/she is 'right on the ball'. I can turn it over to him/her and expect it to be done correctly."

Principals views their responsibilities to review IEPs quite seriously.

As a rule, principals do not attend CORE evaluation meetings. The exceptions are when the principal feels that parental involvement and cooperation is dependent upon his/her presence, when the case involves legal authorities, or a child's possible removal from the classroom, or when the CET requests his/her attendance. The CETs feel that their principal is adequately prepared and appropriately involved in cases.

The CETs prefer to direct the 766 process themselves, and resent principals becoming overly involved or initiatory. At the same time, the principal's complete confidence in and support of CET efforts is essential. In turn, CETs treat their responsibility to inform the principal on 766 implementation, particularly individual cases, as extremely important. Both principals and CETs see the development and maintenance of this school implementation team as critical to school 766 compliance.

Principals and CETs confer daily on 766 implementation. Two schools hold regularly scheduled meetings with agendas. These schools have developed internal recordkeeping systems, and the two implementors meet weekly to update childrens' progress through the 766 process. CET offices are located near the principal's office, and the CET has immediate access to the principal at most times. Principals make themselves very available to CETs for conferences. These conferences most often occur at the request of the CET in the principal's office, though principals also feel free to initiate contact.

There are three types of implementation problems that can occur at the school level. The first is a problem with moving a child through the 766 process, usually with the result that the child does not receive a CORE evaluation and an IEP within thirty days following referral. The second concerns the coordination of services within the building. The third is a problem in getting some component of BPS external to the school to respond to school needs, i.e. an additional resource teacher.

In any of these cases, the CET first attempts to solve the problem without assistance. Depending upon the CET's experience with parents, the community, or DSS, or the CET's rapport with classroom teachers,

he/she is successful. The CETs are aggressive problem-solvers. They are not hesitant to pursue problems through channels to the District and to DSS.

If these CET attempts fail, the CET involves the principal. CETs have confidence in the principal's ability to solve problems relating to parent cooperation. The principal many times takes the lead in working with classroom teachers to resolve placement concerns. Principals, with administrative experience and personal contacts at the District and BPS levels, are more influential in causing the external system to respond to school requests. The principals obtain teaching substitutes to cover classes so that CORE evaluation meetings can be held during school hours with classroom teachers' participation.

While the principal and CET are the major policy implementors at the school level, the school faculty figures prominently in the implementation effort. There are two reasons for this. First, the majority of children referred for Chapter 766 are identified and referred by the regular classroom teacher. Second, from 50% to 80% of these 766 children are then serviced in the regular classroom on either a full or part-time basis with consultative or resource room support. A non-supportive faculty can delay and frustrate placement decisions and actually deny services to children; an uninformed faculty can refer inappropriately and complicate the process.

CETS conversed at length as to the importance and attention with which they foster and maintain a school CORE evaluation team, composed of the referring class teacher, a special education teacher, any specialists (speech, vision, learning disability), and the psychologist. Utilizing a strong team approach increases the efficiency of the 766 process by eliminating inappropriate referrals and ensures continuity from the placement decision to ser-

vice.

School faculty membership is quite stable in the District. The CETs' prior position as class teachers, often in the same school, makes them an established member of the group, and thus aids them in developing the rapport necessary to negiotiate referrals, placements, and service with the teachers. As busy as they are, CETs make time to offer assistance and listen to classroom teachers.

> "Whenever there are conflicts between teachers and aides, between teachers, and between regular and resource teachers, I act as intermediary."
>
> "I think I hear about problems with children before the administration does."

For the most part, CETs are complimentary of classroom teachers, especially the resource teachers with whom they constantly interact. Each can relate stories of teachers serving a child when an alternate placement was unavailable, or in the face of overcrowded conditions.

> "I have not had any 'frivolous' referrals. The problems are real. If anything they're holding back and trying to cope with problems in the regular education situation, part of the reason being they know what the caseload is."

Principals and CETs claim that the classroom teachers could increase their effectiveness if inservice training workshops were offered by BPS for all staff. It has taken four years to communicate sufficiently the 766 referral process to teachers. Frustrated by the absence of BPS in-service support, many teachers have voluntarily taken university courses and/or workshops to acquaint themselves with the philosophies and concepts.

District and school workshops have begun this year, but not in all districts or all schools. CETs see the current training needs as the identification of special needs children, servicing children in the regular classroom, and writing an IEP (Since the IEPs rated as a part of the com-

pliance measure for this study were less than complete, the recommendation seems valid).

A number of inservice days are allocated to the schools each year. Four of the nine sample schools have held workshops on Chapter 766; one invited DSS personnel to address the faculty. The other schools have given the CET the opportunity to discuss 766 problems during other in-service presentations. District principals attended a DSS sponsored workshop on 766 procedures and teachers' role in May, 1977. None could recall any administrator inservice prior to that time.

School-level Consequences

Chapter 766's entry into schools has had several effects on school operations. Some of these were anticipated and desirable; others were unanticipated, and perhaps not so desirable. Those effects mentioned most frequently by principals and CETs included alterations in parental involvement patterns, the coordination and brokering of assistance from several school programs for children, the introduction of new community-based services into the school, and the re-allocation of space resources within the building.

As hoped for through 766, parental involvement in the educational process of their children has greatly increased. In community groups, Chapter 766 parents are not only more knowledgable as to their child's situation, but are better informed about the schools in general.

Implementors have found, however, that parental participation in the Chapter 766 process could not be assumed, and especially on the high school level, could not even be encouraged beyond a certain point.

> "We are about 70% successful in getting parents involved in a core."
> "Parental participation is difficult. We don't have neighborhood schools, so parents have to travel a distance."
> "They can't ever come during the day. They'll call and

> and say I can't come, send the plan home to me. So, that's the way we do it. Reviews? They don't bother at all."

Chapter 766 is one of a group of service programs operating in schools. Most buildings have Title I, remedial reading, IMS math, peer group tutoring, and intern tutoring programs. Energetic CETs have taken on a brokerage function, referring children among programs according to the most beneficial service delivery system. Concurrently, CETs have reached into the community and have initiated university student practicums, mini-grants, swimming programs, field trips, and outreach programs to work with parents unable to come to the school. Besides enriching the school resources and maximizing their effective delivery, there have been some surprising results:

> "You know what we found out? Doing the IMS math with resource kids, they outscored the regular kids. I get the feeling that the special education program is better than regular education."

Whether anticipated or not, District schools are running out of classroom space. BPS' space allocation priorities are clear:

> "First call for space goes to 766, the second to bi-lingual education, third to the regular classroom, and fourth to Title I."

Space for these programs must be equal to that provided for regular classrooms.

> "About a year ago I was told I would have another resource teacher. I called downtown and facetiously asked the person in charge what kind of a form to use to requisition a chandelier from which to hang this new teacher!"
> "If they tell me I have another resource room next year, I have to eliminate another fifth grade class. You end up increasing class size."
> "All the money and privileges are going to 766, and the 'normal' kid is being shunted aside."

The problem of adequate classroom space ranks with the insufficient numbers of staff and programs.

The District and "Downtown" Role in Implementation

Although this study concentrates on school-level implementation efforts, organizationally the school is a component of the larger District and DSS/BPS system, and is dependent on that larger system in many ways. For this reason, one must consider those District and BPS implementation efforts that influence schools' implementation and compliance. Bear in mind that what is reported here are the perceptions of school implementors as respondents, and therefore perhaps a biased, or onesided portrayal of the situation.

From the perspective of school-level implementors BPS' Department of Special Services lacks the communications and management capabilities to respond to school-level needs. These deficits are compounded by DSS' apparent low visibility at both school and District levels. School implementors see themselves as having a completely different concept, the "right" concept, of Chapter 766 implementation.

> "How can administrators in town assume that this is the situation if they don't come to visit the schools? The new Associate Superintendent has to be familiar with the system."

This low visibility, compounded by the communication and management problems has fostered a distrust and resentment of DSS activities and personnel.

> "I get the feeling that in town seems to thrive on all this confusion, that they like it, 'cause people can't pin them down."
> "The Administration at Court Street is too concerned with things other than servicing these kids. I really believe that."
> "...People up there do not know what they want. We know what we do, we service. If downtown disappeared, we could almost still function, maybe not well, but 766 would function. If you took us away, how could 766 work?"

Schools often receive 766 policy and procedures directives verbally, "by word of mouth," sometimes via the district office. They are unsure as to the accuracy of the information, are fearful to resolve the descrepancies at the school-level, and therefore hesitant to act. Often schools receive conflicting directives and requests even in writing. Information emanates from as many as four offices in DSS; at one time school personnel were requested to complete four different forms, each from a separate office, but all requesting the same information.

> "The left hand doesn't know what the right hand is doing."
> "I (principal) registered a formal complaint because I received three forms. One said I had three resource teachers, one said I had four, one said I had five."

Along with differing communication sources, there appears to be different communication channels in use. Resource teachers, who report directly downtown, receive directives contrary to those received by CETs; CETs receive information contrary to that provided to the District Special Education Coordinator; the principals receive a third body of information.

The results are much confusion at the building level and an avowed avoidance of district and BPS contact and reliance. The long term consequence can be the increased autonomy of the schools as operating units, and difficulty in standardizing 766 procedures and performance. BPS 766 Procedures manual, published in June, 1978, is a positive attempt to develop a written communication system. School personnel will use the manual.

BPS has employed three Associate Superintendents for Special Services

in as many years, the beginning years of Chapter 766 implementation. Each has proposed a DSS reorganization. Although some central administration staff have remained these three years, they have held different positions under each Associate Superintendent. Continuity and leadership have been lost. BPS hired a strong Associate Superintendent in January, and school personnel are hopeful that the situation will improve under his direction. He has moved quickly to define and support a "chain of command." To school implementors, he appears to hold central administrators more accountable for their actions, a move seen as beneficial to school operations.

A final criticism of DSS, perhaps an effect of its instability, is its unresponsiveness to school requests and needs. Schools are dependent on the DSS Review Committee to review and approve IEPs for children recommended for substantially separate class placements. Review Committee involvement has delayed placement processes for months. CETs relate stories of misplaced IEPs and stalled bureaucratic procedures. The delay was ended only by principal or CET intervention directly into the problem (phone calls and personal visits). Review Committee efficiency has improved with time.

The same delays are found with requests for additional staff or materials. One principal has waited seven months for a definite answer to his request for a resource teacher. As with the Review Committee, the resolution is persistent telephone calls and personal visits.

The District office is "caught somewhere in the middle." The Special Education Coordinator is the primary information source for principals and CETs. However, his/her information has proven incorrect or inconsistent with DSS, so his/her credibility as a source is questionable. CETs do rely on him/her for his/her experience and competence in 766 procedures

and programming.

"She's very good. She'll help you any way she can. She's very knowledgeable and she'll back up what she says."

Recognizing that the Coordinator's line of authority is undefined, rather than asking her to resolve an issue, CETs will request her to contact DSS for them. They do not see the Coordinator as their supervisor.

Through the Coordinator's initiative, CETs meet monthly to discuss progress and share information. These meetings have become the inservice support for CETs and have helped make school operations consistent throughout the District.

At the same time, District practices have complicated the paperwork at the school-level. CETs resent responding to the Coordinator's data and review requests when they overlap those of DSS or/and review appears unnecessary.

Conclusions

The findings discussed in this paper are not based on a complete analysis of the compliance measure and caseload management survey; rather, they are preliminary findings. Plans are to extend the compliance measure to include data from the past year of implementation before correlating these compliance data with implementation efforts. This more comprehensive data set will provide a more stable picture of each school's compliance performance. Tentative correlates to compliance, or implementation to compliance, or implementation factors, are proposed at this time.

The Study of Special Education Policy Implementation

The study findings substantiate the complexity of special education policy implementation. The number of implementing orgainizations is large: federal, state, often intermediate units, and local education agencies.

But the policy implementation does not end with the policy's entry into the LEA. There are, in an urban LEA such as Boston, at least three organizational environments, acting interdependently so to affect the policy: the central administration, the decentralized administrative unit or district, and the school. The intra-organizational operation of any of these bureaucratic units as well as the inter-organizational dynamics must be considered and studied.

The school, as that organization most directly tied to special education service delivery, and therefore to compliance, assumes great importance.

School-Level Implementation Factors

The implementation factors related to school compliance with special education policy include the following:

1. Goal Consensus and Role Clarity on the Part of School Personnel

   Goal consensus implies that the principal, and/or other major implementors, and faculty agree on the policy's goals, objectives, and administrative procedures. Since the criteria for compliance are provided by other implementing organizations, (i.e. the central system, the state, the Federal Government) it is also necessary that the schools have the same understanding of the goals as these organizations. From goals, role expectations are developed for each group. Role clarity, then, indicates that each group understands these expectations, the behaviors and/or practices required of them by the policy.

2. The Sophistication of the School as an Organization

   Sophistication is defined as the extent to which the school has developed effective internal communication, coordination, and management processes, and defined a system of rewards or incentives by which to direct or influence behavior.

3. Communication Capability

   Communication capability is sufficient if there is in operation a comprehensive communication mechanism to insure the transmission of valid and reliable information in a uniform manner between the school and other implementing organizations.

4. Resource Allocation Capacity

   There must be sufficient human, fiscal, physical, and material resources made available to the schools to enable them to meet their compliance responsibilities. This includes the necessity of assigning specific responsibility for compliance to specified individuals within the school rather than attempting haphazard,

piecemeal implementation. Inter-organizational processes must exist to facilitate schools' aquisitioning of these necessary resources.

5. Locus of Control

School policy implementors must exercise administrative or management control over the components of the implementation process necessary for compliance; i.e. school control over the referral, assessment, placement, and review procedures should be commensurate with their responsibilities.

6. Commitment to Compliance

This is defined as the degree to which school-level implementors value the policys' goals and objectives, advocate compliance, and reward compliance-directed behaviors on the part of school personnel. This factor is personalogical, that is, related to the implementor's personal values, attitudes, and motivations. A correlate may be professional identity, supposing that commitment to compliance with a law is tied to one's socialized value of obedience to rules, and therefore to a personal definition of professional performance--the professional educator obeys the rules, follows directives, and gets the job done.

7. Caseload Management

The numbers of children referred for special education services under the policy determine the nature and extent of the compliance task. The ability of the school to manage this caseload and facilitate children's progress is required.

8. Elapsed Time

As obvious as it may appear, schools more closely approximate compliance as the elapsed time between the adoption of the policy statement and the compliance measure increases.

Preliminary Bibliography

Anderson, James E. (Ed.). Cases in Public Policy-Making. New York: Praeger Publishers, Inc., 1976.

Backoff, Robert. "Operationalizing Administrative Reform for Improved Governmental Performance," Administration and Society, VI, No. 1 (May 1974), 73-106.

Bailey, Stephen, and Edith K. Mosher. ESEA, The Office of Education Administers a Law. Syracuse: Syracuse University Press, 1968.

Blake, Harlan M. "Beyond the ITT Case: The Politics of Anti-trust Enforcement," Cases in Public Policy-Making. Edited by James E. Anderson. New York: Praeger Publishers, Inc., 1976.

Becker, Selwyn W. and Duncan Neuhauser. The Efficient Organization. New York: Elsevier Scientific Publishing Company, Inc., 1975.

Budoff, Milton, Sibye Mitchell and Lawrence Koun. Procedural Due Process: Its Application to Special Education and Its Implications for Teacher Training. Funded under Field-Initiated Studies, DID/BEH/ USOE, G00-75-02322. Cambridge: Research Institute for Educational Problems, Inc., 1976.

Bullock, Charles S., and Harrell R. Rodgers, Jr. "Civil Rights Policies and the Matter of Compliance," Cases in Public Policy-Making. Edited by James E. Anderson. New York: Praeger Publishers, Inc., 1976.

De Sola Pool, Ithiel (Ed.). Trends in Content Analysis. Urbana, Ill.: University of Illinois Press, 1954.

Elmore, Richard F. "Lessons from Follow Through," Policy Analysis, I, No. 3 (Summer 1975), 485-95.

Gross, Neal, Joseph Giacquinta, and Marilyn Bernstein. Implementing Organizational Innovations, A Sociological Analysis of Planned Educational Change. New York: Basic Books, Inc., 1971.

Halperin, Morton H. "Implementing Presidential Foreign Policy Decisions: Limitations and Resistance," Cases in Public Policy-Making. Edited by James E. Anderson. New York: Praeger Publishers, Inc., 1976.

Hage, Jerald. Techniques and Problems of Theory Construction in Sociology. New York: John Wiley and Sons, Inc., 1972.

Hargrove, Erwin C. The Missing Link: The Study of the Implementation of Social Policy. Washington, D. C.: The Urban Institute, 1975.

Kaufman, Herbert. The Limits of Organizational Change. University, Ala.: The University of Alabama Press, 1976.

Kerlinger, Fred N. Foundations of Behavioral Research. Second edition. New York: Holt, Rinehart and Winston, Inc., 1973.

Kritek, William J. "Lessons from the Literature on Implementation," Educational Administration Quarterly, XII, No. 3 (Fall 1976), 86-102.

Levy, Frank, Arnold J. Meltsner, and Aaron Wildavsky. Urban Outcomes. Berkeley and Los Angeles: University of California Press, 1974.

Lipsky, Michael and Richard Weatherley. Street-Level Bureaucrats and Institutional Innovations: Implementing Special Education Reform in Massachusetts. Funded under the Field-Initiated Studies Program, Research Projects Branch, DID/BEH/USOE, G00-75-00353, March 1975-1976.

Pressman, Jeffrey L. and Aaron B. Wildavsky. Implementation. Berkeley and Los Angeles: University of California Press, 1973.

Quade, E. S. Analysis for Public Decisions. New York: Elsevier Scientific Publishing Company, Inc., 1975.

Reynolds, Larry J. "Reducing the Unanticipated Consequences of Change," Administrator's Notebook, XXII (December 1973), 1-4.

Reynolds, Maynard C. and Jack W. Birch, "Mainstream Education: Focus on Individualization," UCEA Review, XVIII, No. 2 (January 1977), 2-8.

Smith, Louis M. and Pat M. Keith. Anatomy of Educational Innovations. New York: John Wiley, 1971.

Tufte, Edward R. Data Analysis for Politics and Policy. Englewood Cliffs, N. J.: Prentice-Hall, Inc., 1974.

Van Meter, Donald S. and Carl Van Horn, "The Policy Implementation Process: A Conceptual Framework," Administration and Society, VI, No. 4 (February 1975), 445-88.

Weikart, David P. and Bernard A. Banet. "Planned Variation from the Perspective of a Model Sponsor," Policy Analysis, I, No. 3 (Summer 1975), 484-510.

Weintraub, Frederick J., Alan Abeson, Joseph Ballard and Martin L. LaVor (Eds.). Public Policy and the Education of Exceptional Children. Reston, Va.: The Council for Exceptional Children, 1976.

Williams, Walter. "Implementation Analysis and Assessment," Policy Analysis, I, No. 3 (Summer 1975), 531-66.

Appendix A Compliance Measure

School	Enrollment	Chapter 766 referrals requiring Program reviews Average - Jan.-Mar. 1977	Chapter 766 referrals requiring Program reviews Average - Jan.-Mar.	Chapter 766 Children 90% - caseload @ school	Education Plans written Average - Jan. - Mar.	Caseload - Total Average - Jan.-Mar.	Children waiting for CORE - accumulative	Children waiting over 30 days for Reviews	Children awaiting for Program Review Committee Aver. - Jan.-Mar.	Children with signed Plans awaiting Jan.-Mar. Placement with unsigned Plans or Aver. - Jan.-Mar. approv. of	Sample:
A	1092	3.0	8.3	5.6	6.6		0	18.6	11.3	11.9	
B	1369	1.0	7.0	4.0	16.3	185	0	.6	1.3	3.6	X
C	200	.3	2.0	1.3	3.3	See E.	0	4.0	1.0	2.6	
D	1391	10.0	17.0	8.3	38.0	137	3.3	0	.3	2.6	X
E	555	1.6	4.0	1.3	8.3	151	1.0	7.1	3.3	.6	
F	896	5.6	6.3	7.6	4.3	230	4.3	22.0	6.6	2.6	X
G	292	2.3	3.3	1.0	4.0		3.6	4.3	.3	3.6	X
H	307	2.3	2.6	2.0	6.6	81	2.3	2.3	0	5.6	X
I	236	3.3	1.6	1.0	4.0	See S.	1.6	1.3	3.0	.3	
J	357	2.0	3.0	1.0	6.6	See Q.	0	0	0	0	
K	430	3.0	6.3	.6	10.0	92	0	3.0	0	0	X
L	535	5.3	6.6	2.3	17.0	107	1.3	6.3	1.0	5.6	X
M	996	9.3	7.3	3.6	24.0	200	6.6	11.0	2.6	4.6	
N	371	1.0	11.3	1.0	12.3	See T.	2.3	2.0	6.6	2.0	
O	1026	5.6	7.3	7.0	19.0	213	13.0	6.0	5.3	2.6	X
P	605	3.3	4.3	3.6	14.0		0	2.3	7.0	3.6	
Q	257	3.0	1.0	1.6	5.3	147	0	0	0	0	
R	675	9.3	10.6	3.6	13.6	160	4.3	4.3	3.0	18.9	
S	308	3.0	2.6	2.0	7.3	90	3.0	3.6	2.6	.6	X
T	191	.3	5.0	.6	7.3	146	0	.6	.6	1.3	
U	310	1.3	.6	1.6	6.6	See V.	1.0	1.6	1.3	1.6	
V	321	.3	1.6	2.0	3.6	123	0	0	1.0	1.0	

A,B = High Schools C-F = Middle Schools G-V = Elementary Schools

APPENDIX B

IEP COMPLIANCE CHECKLIST

766
Referdent

321.1 (d)	1. Are general, long-term objectives listed in priority order? (Note: These are goal statements, not necessarily measurable.)
321.1 (b) (c)	2. Is there a statement describing physical constraints and learning style?
321.1 (d)	3. Are specific, quarterly objectives listed covering the next four quarters?
321.4 (g)	4. Is a starting date listed for each objective?
321.2 (a)	5. Are the number of hours per week (frequency) noted for each objective during each quarter (duration)?
321.2 (e)	6. Is a grouping pattern indicated for each specific objective?
321.3	7. Is the type of program that each objective is to be achieved in noted? (Note: Type refers to regular or special.)
321.4 (a)	8. Is the provider (name of person) of the service listed?
321.4 (b)	9. Is the location (name of school, clinic) of the service listed?
321.3	10. Is the program prototype recorded?
321.5 (d)	11. Is the next least restrictive prototype listed?
321.5 (d)	12. Are criteria for placement in the next least restrictive prototype recorded?
321.5 (c)	13. Are transportation provisions recorded?
321.5 (e)	14. Are the (a) name and (b) position of the person responsible for monitoring the plan stated?

766
Referdent

15. Is relevant student information indicated?
    (a) name
    (b) address
    (c) school
    (d) date of birth
    (e) type of evaluation
    (f) identification number

311.0

16. Are the names and positions of each person attending the meeting noted?

17. Did each person attending the meeting sign the plan?

18. Did the Special Education Director sign the plan?

19. Did the Building Principal sign the plan?

20. Are the plans legibly written?

322.3

21. If a placement is made outside the LEA, (prototype 502.5 or more) is there a statement signed by the Director of the accepting facility that they can provide the services indicated in the plan?

22. Is a parent/guardian signature evident?

325.0

23. Did the parent/guardian either accept or reject the plan?

321.1 (d)

Statement of Objectives for 3-6-9-12 month intervals

24. Are the listed objectives stated in measurable terms?

25. Are the conditions specified under which the objectives will be met?

26. Are the evaluation criteria noted for each objective?

27. Is there a logical relationship evidenced among the objectives?

28. Are there recognizable sequential patterns between the termination of one quarter objective and the initiation of another?

29. Does the total amount of weekly time allotted to all listed objectives for each quarter approximately equal
    (a) 6 hours for prototype 502.2?
    (b) 15 hours for prototype 502.3?
    (c) 25 hours for prototype 502.4?

30. Are the objectives consistent with the learning styles identified?

APPENDIX C

INTERVIEW GUIDE

1. Can you tell me something of your prior involvement with Boston Public Schools?
    a. with Special Education?
    b. with Chapter 766?
2. What is your professional background and preparation?
    a. What certification(s) do you hold?
    b. What coursework have you completed in the area of Special Education?

Let's talk about Chapter 766 policy itself:

3. What do you believe to be the educational goals of Chapter 766?
    a. How clearly have these goals, objectives, and requirements been stated?
    b. How well do you feel you understand these goals and the requirements developed to meet them?
    c. How have these goals, objectives, and requirements <u>changed</u> since the policy was introduced three years ago?
4. In your opinion, how important is it that Chapter 766 is fully implemented?
    a. Is full implementation possible?
    b. How complex is that task?
5. How has the implementation of Chapter 766 affected the concept and delivery of special education services?

6. Under Chapter 766, how would you describe your role and responsibilities?
    a. To what extent have these been clearly specified?
    b. How are these roles and responsibilities different from pre-Chapter 766?
    c. Do you believe you can fulfill your Chapter 766 role?
    d. How do you think your Principal (or CET) sees his/her role?

Let's recall the beginning of Chapter 766 implementation, and what that period was like:

7. What planning activities preceeded Chapter 766?
    a. What inservice activities were provided?
8. What planning and support activities have continued, or are operating at present?
    a. Who initiates these?
    b. Who provides these?
    c. What are the purposes of these activities?
    d. In your opinion, how effective are they?

Let's focus on your implementation efforts in your school:

9. What special education programs are operating in your building?
10. How do you and your Principal (or CET) divide or share your implementation responsibilities?
11. What decisions do you have to make about the administration of Chapter 766?
    a. How often do decisions have to be made?
    b. How are these decisions made?

12. How do you monitor Chapter 766 implementation?

    a. How do you identify and solve any problems?

13. What changes have you made in the organization of or resource allocation within your building (i.e. to facilities, personnel, children, materials, procedures)?

14. How are directives regarding Chapter 766 communicated to you?

    a. From where or whom do you obtain necessary information?

    b. Is that information clear, consistent, timely, and sufficient?

    c. How do you obtain any help or technical assistance you might need?

15. How do you communicate your Chapter 766 problems or information to those outside your building?

16. How are parents, parent groups, and/or community groups involved in Chapter 766 implementation?

It seems to me that the availability of school resources enters into Chapter 766 implementation:

17. Has Chapter 766 caused you to require more money, staff, physical facilities or other resources?

    a. How have you been able to acquire these?

    b. Are there more such resources available to you should you need them?

    c. Are there resources you need that you cannot obtain?

18. How are you able to hold CORE evaluations and reviews during school hours?

    a. Can you access outside specialists such as school psychologists and private agency persons?

19. What discretion and alternatives do you feel you have over procedures to implement Chapter 766?

    a. To what extent do you directly control the application of these procedures?

In Boston, implementation is actually interpreted to mean compliance:

20. What does "compliance" mean to you?

    a. In your opinion is your building in compliance with the requirements of Chapter 766?

    b. If not, how are you in noncompliance?

    c. What causes non-compliance?

21. To what extent can you affect or control your school's compliance?

22. Why do you want to comply with Chapter 766?

    a. What incentives exist that cause you to want to comply?

    b. What sanctions or penalities are leveled against you for non-compliance?

    c. How do you motivate the school staff toward compliance?

23. (To the CET) Could you describe your present caseload to me?

    a. How many CORE evaluations and reviews do you conduct each month?

    b. What percentage of your caseload is in .1, .2,.3, .4, .5, or .6 placements?

    c. What percentage of potential placements require District-level or central Review Committee approval?

    d. What percentage of these (c.) are returned to you before they are disapproved? For what reasons?

    e. How long does the Distrcit and/or system review take?

In summary:

24. Are there any unanticipated consequences of Chapter 766?

25. Can you identify any additional facilitators or constraints to compliance?

    a. What present requirements are unnecessary?

    b. What would have to be done to remove these?

    c. To what extent are you in agreement with present efforts?

    d. How do you feel about your job? Are you planning to remain in this position next ye ?

Appendix D

Caseload Management Survey

Preliminary Analysis

Question One:

a. How many students are currently in your caseload?

Principal (N=14) =107.5	CET = 148.6 (N=14)
Secondary =227 (N=2)	Secondary =175.7 (N=4)
Elementary =87.6 (N=12)	Elementary =137.7 (N=10)

b. How many students were in your caseload last spring?

Principal = 81.6 (N=12)	CET = 115.2 (N=12)
Secondary = (N=0)	Secondary = 126.5 (N=2)
Elementary = 81.6 (N=12)	Elementary = 112.9 (N=10)

Caseload increase since last spring:

Principal increase of 25.9	CET increase of 33.2
Secondary N/A	Secondary increase of 49.2
Elementary increase of 6.0	Elementary increase of 24.8

Question Two: In your estimation, how many of these children will be or have been placed in each of the following prototypes?

no 766 placement

Principal =1.2 (N=18)	CET =1.0 (N=11)
Secondary =3.25 (N=4)	Secondary = 4 (N=1)
Elementary =.64 (N=14)	Elementary = .7 (N=10)

502.1

Principal =7.6 (N=18)	CET =10.6 (N=14)
Secondary =10 (N=4)	Secondary =10.5 (N=4)
Elementary =7 (N=14)	Elementary =10.7 (N=10)

502.2

Principal = 45.93 (N=18)	CET = 47.1 (N=14)
Secondary =55.7 (N=4)	Secondary =15.0 (N=4)
Elementary = 43.14 (N=14)	Elementary = 60.0 (N=10)

502.3

Principal = 27.9 (N=18)	CET = 42.0 (N=14)
Secondary =41.2 (N=4)	Secondary = 54.0 (N=4)
Elementary =24.14 (N=14)	Elementary = 37.3 (N=10)

503.4

Principal = 15.5 (N=18)	CET = 23.1 (N=14)
Secondary = 23.2 (N=4)	Secondary = 28.3 (N=4)
Elementary = 13.2 (N=14)	Elementary = 21.0 (N=10)

502.5

Principal = 7.8 (N=18)	CET = 11.9 (N=14)
Secondary = 15.0 (N=4)	Secondary = 17.0 (N=4)
Elementary = 5.79 (N=14)	Elementary = 9.9 (N=10)

502.6

Principal	CET
= 2.9 (N=14)	= 4.0 (N=14)
Secondary = 6.0 (N=4)	Secondary = 10.5 (N=4)
Elementary = 1.29 (N=14)	Elementary = 1.4 (N=10)

502.7

Principal	CET
= .28 (N=18)	=.43 (N=14)
Secondary = .25 (N=4)	Secondary = .25 (N=4)
Elementary = .29 (N=14)	Elementary = .5 (N=10)

502.8

Principal	CET
0 (N=14)	= 0 (N=14)
Secondary = 0 (N=4)	Secondary = 0 (N=4)
Elementary = 0 (N=14)	Elementary =0 (N=10)

502.9

Principal	CET
=.05 (N=18)	= .07 (N=14)
Secondary = 0 (N=4)	Secondary = 0 (N=4)
Elementary = .07 (N=14)	Elementary = .10 (N=10)

502.11

Principal	CET
= .05 (N=18)	= .07 (N=14)
Secondary = .25 (N=4)	Secondary = .25 (N=4)
Elementary = 0 (N=14)	Elementary = 0 (N=10)

Question Three: How many of the children in your caseload are

preschool age residing near your school(s)

Principal	CET
=2.0(N=18)	= 2.6 (N=14)
Secondary == 0 (N=4)	Secondary = 0 (N=4)
Elementary =2.6 (N=14)	Elementary = 3.7 (N=10)

enrolled in private school near your public school

Principal	CET
= 6.2 (N=18)	= 9.5 (N=14)
Secondary = 7.0 (N=4)	Secondary = 11.25 (N=4)
Elementary = 6.0 (N=14)	Elementary = 8.8 (N=10)

out of school or in a private agency

Principal	CET
= 5.05 (N=18)	= 6.07 (N=14)
Secondary = 13.7 (N=4)	Secondary = 11.25 (N=4)
Elementary = 2.57 (N=14)	Elementary = 4.0 (N=10)

post-school age residing near your school(s)

Principal	CET
= .44 (N=18)	= .57 (N=14)
Secondary = 2.0 (N=4)	Secondary = 2.0 (N=4)
Elementary = 0 (N=14)	Elementary = 0 (N=10)

Question four: What is the average number of referrals you receive each month?

	Principal		CET	
	Secondary N=	Elementary N=	Secondary N=	Elementary N=
0 to 3	1	3	0	1
4 to 6	2	8	3	5
7 to 10	1	2	1	3
11 to 14	0	1	0	1
over 14	0	0	0	0

Question five: What is the average number of intermediate and full CORE evaluations you conduct each month?

	Principal		CET	
	Secondary N=	Elementary N=	Secondary N=	Elementary N=
0 to 3	2	1	1	0
4 to 6	1	8	2	5
7 to 10	1	4	0	4
11 to 14	0	1	0	1
over 14	0	0	1	0

Question six: What is the average number of Reviews you complete each month?

	Principal		CET	
	Secondary N=	Elementary N=	Secondary N=	Elementary N=
0 to 3	0	0	0	0
4 to 6	1	4	0	2
7 to 10	2	7	2	3
11 to 14	0	1	1	3
over 14	1	2	1	2

Question seven: What is the average number of Education Plans you complete each month?

	Principal		CET	
	Secondary N=	Elementary N=	Secondary N=	Elementary N=
0 to 3	0	0	0	0
4 to 6	0	2	1	0
7 to 10	1	6	0	2
11 to 14	2	4	1	4
over 14	1	2	2	4

Question eight: (On a scale from 1 to 7) To what extent does the severity of the possible placement (.4,.5,.6 etc) influence caseload management?

1.0=adds nothing to caseload management
7.0 = causes most severe caseload management problems

Principal = 6.0 (N=18)
Secondary 5.6 (N=4)
Elementary = 6.07 (N=14)

CET = 5.4 (N=14)
Secondary = 5.5 (N=4)
Elementary = 5.4 (N=10)

In rank order, from 1=most influential, indicate why the severity of the prototype placement contributes to management problems and tasks.

involves more personnel from different settings in the evaluation and CORE

Principal = 2.4 (N=15)
Secondary = 1.5 (N=2)
Elementary = 2.54 (N=13)

CET = 2.1 (N=14)
Secondary = 1.5 (N=4)
Elementary = 2.3 (N=10)

takes more time to write the Education Plan,

Principal = 2.7 (N=15)
Secondary = 3.0 (N=2)
Elementary = 2.69 (N=13)

CET = 3.2 (N=14)
Secondary = 3.0 (N=4)
Elementary = 3.3 (N=10)

requires more evaluation activities

Principal = 3.4 (N=15)
Secondary = 1.5 (N=2)
Elementary = 3.69 (N=13)

CET = 2.5 (N=14)
Secondary = 1.2 (N=4)
Elementary = 3.0 (N=10)

more difficult to obtain parental involvement and agreement

Principal = 4.7 (N=15)
Secondary = 5.5 (N=2)
Elementary = 4.61 (N=13)

CET = 4.8 (N=14)
Secondary = 4.9 (N=4)
Elementary 4.78 (N=10)

more difficult to find an appropriate program of services

Principal =5.0 (N=15)
Secondary = 5.5 (N=2)
Elementary = 4.92 (N=13)

CET = 5.07 (N=14)
Secondary == 5.0 (N=4)
Elementary = 5.11 (N=14)

involves central Review Committee and Education Plan approval

Principal	CET
= 2.73 (N=15)	= 3.1 (N=14)
Secondary = 4.0 (N=2)	Secondary = 4.4 (N=4)
Elementary = 2.54 (N=13)	Elementary = 2.6 (N=10)

Question nine: (On a scale from 1 to 7) To what extent do referrals of children attending private schools or service agency programs geocoded to you add to caseload management?

1.0 = adds nothing to caseload management
7.0 = causes most severe caseload management problems

Principal	CET
= 4.9 (N=16)	= 5.4 (N=13)
Secondary =5.4 (N=2)	Secondary = 6.0 (N=4)
Elementary = 5.18 (N=14)	Elementary = 5.1 (N=9)

In rank order, from 1=most influential, indicate why the geocoded referrals contribute to management problems and tasks.

involves more personnel from different settings in the evaluation and CORE

Principal	CET
= 2.0 (N= 16)	= 1.8 (N=13)
Secondary = 1.5 (N=2)	Secondary = 1.7 (N=4)
Elementary = 2.07 (N=14)	Elementary = 1.9 (N=9)

takes more time to write the Education Plan

Principal	CET
= 3.8 (N=16)	= 4.0 (N=12)
Secondary = 3.0 (N=2)	Secondary = 3.3 (N=4)
Elementary = 3.93 (N=14)	Elementary = 4.37 (N=8)

requires more evaluation activities

Principal	CET
= 3.4 (N=16)	= 2.9 (N=12)
Secondary = 1.5 (N=2)	Secondary = 1.8 (N=4)
Elementary = 3.71 (N=14)	Elementary = 3.5 (N=8)

more difficult to obtain parental involvement and agreement

Principal	CET
= 4.7 (N=16)	= 4.5 (N=13)
Secondary 5.5 (N=2)	Secondary = 4.8 (N=4)
Elementary = 4.64 (N=14)	Elementary = 4.44 (N=9)

more difficult to find an appropriate program of services

Principal	CET
= 4.4 (N=16)	= 5.0 (N=12)
Secondary = 5.5 (N=2)	Secondary = 6.0 (N=4)
Elementary = 4.29 (N=14)	Elementary = 4.5 (N=8)

involves central Review Committee and Education Plan approval

Principal	CET
= 2.9 (N=16)	= 3.4 (N=13)
Secondary = 4.0 (N=2)	Secondary = 4.6 (N=4)
Elementary = 2.79 (N=14)	Elementary = 2.87 (=9)

other:

Secondary-time away from in school students; outside opinions (4)
Elementary-difficult to get appropriate assessments; travel, communication, scheduling.

Question ten: (On a scale from 1 to 7) To what extent do referrals of either pre-school or post-school age children add to caseload management?

1.0 = adds nothing to caseload management
7.0 = causes most severe caseload management problems

Principal = 4.7 (N=15)	CET = 4.4 (N=11)
Secondary = 4.0 (N=1)	Secondary = 2.5 (N=1)
Elementary 4.71 (N=14)	Elementary = 4.5 (N=10)

In rank order, 1=most influential, indicate why pre-school or post-school age referrals add to caseload management.

involves more personnel from different agencies in evaluation and CORE

Principal = 1.9 (N=15)	CET = 1.9 (N=11)
Secondary = 3.0 (N=1)	Secondary = 3.0 (N=1)
Elementary = 1.86 (N=14)	Elementary = 1.8 (N=10)

takes more time to write the Education Plan

Principal = 4.0 (N=15)	CET = 5.3 (N=10)
Secondary 4.0 (N=1)	Secondary = 4.0 (N=1)
Elementary = 4.0 (N=14)	Elementary = 5.44 (N=9)

requires more evaluation activities

Principal = 3.7 (N=15)	CET = 3.3 (N=10)
Secondary = 2.0 (N=1)	Secondary = 2.0 (N=1)
Elementary = 3.79 (N=14)	Elementary = 3.44 (N=9)

more difficult to obtain parental involvement and agreement

Principal = 4.5 (N=15)	CET = 4.9 (N=11)
Secondary = 7.0 (N=1)	Secondary = 7.0 (N=1)
Elementary = 4.29 (N=14)	Elementary = 4.7 (N=10)

more difficult to find the appropriate program of services

Principal = 3.9 (N=15)	CET = 4.0 (N=10)
Secondary = 6.0 (N=1)	Secondary = 6.0 (N=1)
Elementary = 3.79 (N=14)	Elementary = 3.78 (N=9)

involves central Review Committee and Education Plan approval

Principal = 3.5 (N=15)	CET = 2.8 (N=11)
Secondary =5.0 (N=1)	Secondary = 5.0 (N=1)
Elementary = 3.43 (N=14)	Elementary = 2.55 (N=10)

other:

Secondary: takes time away from inschool students
Elementary- difficult to get appropriate assessments; communication, travel, accessibility of information, scheduling.

Question eleven: Rank order the following "non-compliance" areas as to 1=most serious non-compliance area, to be avoided at all costs,... to 6=least serious non-compliance area.

student waiting over thirty days for CORE

Principal	CET
= 3.8 (N=15)	= 3.4 (N=13)
Secondary = 6.0 (N=2)	Secondary = 4.9 (N=4)
Elementary = 3.46 (N=13)	Elementary = 2.78 (N=9)

student waiting over thirty days for placement (.4,.5,.6 etc.).

Principal	CET
= 2.3 (N=15)	= 2.7 (N=13)
Secondary = 3.0 (N=2)	Secondary = 3.5 (N=4)
Elementary = 2.23 (N=13)	Elementary = 2.33 (N=9)

student not receiving Education Plan Review

Principal	CET
= 4.1 (N=15)	= 4.0 (N=13)
Secondary = 3.0 (N=2)	Secondary = 2.5 (N=4)
Elementary = 4.23 (N=13)	Elementary = 4.7 (N=9)

student with signed Education Plan not receiving services (.1,.2,.3).

Principal	CET
= 4.0 (N=15)	= 4.1 (N=13)
Secondary = 3.0 (N=2)	Secondary = 4.3 (N=4)
Elementary = 4.15 (N=13)	Elementary = 4.2 (N=9)

student with unsigned Education Plan

Principal	CET
= 4.6 (N=15)	= 4.5 (N=13)
Secondary = 3.0 (N=2)	Secondary = 4.0 (N=4)
Elementary = 4.85 (N=13)	Elementary = 4.67 (N=9)

student awaiting central Review Committee approval

Principal	CET
= 2.2 (N=15)	= 2.5 (N=13)
Secondary = 3.0 (N=2)	Secondary = 3.0 (N=4)
Elementary = 2.08 (N=13)	Elementary = 2.33 (N=9)

other: I refused to respond saying to be in noncompliance is intolerable.

Question twelve: Given the professional performance on your part that you prefer, what size caseload can you adequately manage?

Principal	CET
= 75.2 (N=18)	= 85.6 (N=14)
Secondary = 103.0 (N=4)	Secondary = 109.5 (N=4)
Elementary = 68.0 (N=14)	Elementary = 76.1 (N=10)

*with full time clerical help